

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF VERMONT

UNITED STATES OF AMERICA,)	
Plaintiff,)	
)	
v.)	Docket No. 2:23-mj-58-3
)	
NASIR HUSSAIN,)	
Defendant.)	

MOTION FOR DETENTION

NOW COMES the United States of America, by and through its attorney, Nikolas P. Kerest, United States Attorney for the District of Vermont moves for pretrial detention of the above-named defendant pursuant to 18 U.S.C. § 3142(e) and (f).

1. Eligibility for Detention. This defendant is eligible for detention because the case involves a serious risk that defendant will flee. *See* 18 U.S.C. § 3142(f)(2)(A).

2. Reason For Detention. The Court should detain the defendant because there are no conditions of release which will reasonably assure the defendant's appearance as required.

Hussain is an Indian national who first came to the United States on a J-1 visa. He was arrested at JFK Airport as he entered the country on a flight from India via the United Arab Emirates, suggesting he maintains active international ties.

As alleged in the complaint, Hussain recruits and manages a group of "money mules" who transfer money through accounts opened to facilitate fraud schemes. Hussain thus has access to funds in an ever-changing number of bank accounts.

Given his international connections and access to funds, and now facing serious criminal charges, Hussain presents a significant risk of flight. The Court should order him detained pending further proceedings in the case.

3. Rebuttable Presumption. The United States will not invoke the rebuttable presumption against defendant under § 3142(e).
4. Time For Detention Hearing. The United States requests the court conduct the detention hearing upon completion of the pretrial services report.

Dated at Burlington, in the District of Vermont, May 17, 2023.

Respectfully submitted,

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